

**UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND  
Northern Division**

**RON L. LACKS, PERSONAL  
REPRESENTATIVE OF THE ESTATE OF  
HENRIETTA LACKS,**

Plaintiff,

v.

**THERMO FISHER SCIENTIFIC INC.,**

Defendant.

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Civil No. DLB-21-02524

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*AMICUS CURIAE* PROFESSORS CAPRICE ROBERTS AND DOUGLAS RENDLEMAN'S  
LINE IN SUPPORT OF PLAINTIFF'S OPPOSITION TO DEFENDANT'S  
MOTION TO DISMISS PLAINTIFF'S SECOND AMENDED COMPLAINT

COMES NOW *amicus curiae* professors Caprice Roberts and Douglas Rendleman, through undersigned counsel, who hereby adopt and incorporate by reference their Memorandum [ECF No. 67] in support of plaintiff's opposition to defendant's motion to dismiss plaintiff's second amended complaint. For the reasons stated there and as briefed by plaintiff, that motion should be denied.

Dated: February 24, 2023

Respectfully submitted,

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/s/ Andrew C. White  
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Counsel for *amicus curiae* Professors  
Caprice Roberts and Douglas Rendleman

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I filed the foregoing *Amicus Curiae* Professors Caprice Roberts and Douglas Rendleman's Line in Support of Plaintiff's Opposition to Defendant's Motion to Dismiss Plaintiff's Second Amended Complaint with the Court's CM/ECF system, which shall cause copies of the same to be distributed to all counsel of record.

Dated: February 24, 2023

Respectfully submitted,

/s/ Andrew C. White  
Andrew C. White (Bar No. 08821)